REMARKS

This Amendment responds to the Office Action dated August 10, 2006.

The Examiner rejected claims 7, 14, 15, 20, and 21 under 35 U.S.C. § 112 as being indefinite, contending that the term "substantially" lacks sufficient definition in the specification. Each of claims 7, 14, 15, 20, and 21 has been amended to remove the term "substantially." Therefore the applicant respectfully request that the rejection of these claims under 35 U.S.C. § 112 be withdrawn.

The Examiner rejected claims 1-22 and 24 under 35 U.S.C. § 102(e) as being anticipated by Zeng et al., U.S. Patent No. 6,505,299 (hereinafter Zeng). As stated in applicant's responses to previous office actions, every embodiment specifically disclosed by Zeng transposes at least one coefficient only in a direction *parallel* to the axis of packetization, which is seen as the horizontal length along slice 94 in FIG. 8 of Zeng. *See, e.g.* Specification at page 3, lines 16-18 (stating that packetization occurs horizontally along a slice of an image). Furthermore, FIG. 8 of Zeng shows, (by following the arrows backward to the slice 94), that any coefficient shuffled to a position more than one space vertically in a column, within it's sub-band, must be shuffled along the direction of packetization, and that any coefficient shuffled to a location matching it's original even/odd position in a column is shuffled *only* in the direction of packetization. Hence both Zeng's constrained and unconstrained shuffling methods include shuffling some coefficients only in a direction parallel to the axis of packetization. (*See, e.g.* coefficients C, D, E, F, K, and L in the constrained shuffled sub-band method, and coefficients B, E, K, U, and V in the unconstrained shuffled sub-band method, shown in FIG 9 of Zeng.) As amended, each of independent claims 1, 8, 15, 21, 22, and 24, however, recites the limitation of "wherein every

step by which a coefficient is transposed, transposes said coefficient in at least in a direction" orthogonal to an axis of packetization (e.g., claim 1), a first axis which is along an axis of packetization (e.g. claim 15), etc. Therefore, each of claims 1, 8, 15, 21, 22, and 24, along with their respective dependent claims 2-7, 9-14, an 16-20 patentably distinguish over Zeng.

The Examiner points to the block rotator 90 of Zeng as disclosing transposition orthogonal to an axis of packetization. However, col. 8 lines 36-43 of the cited prior art states "that the *block rotator* selects a 90 degree orientation to the axis of packetization." (emphasis added). Thus, the block *rotator* of Zeng does not *transpose* coefficients from one array with those of another array. Instead, the rotator simply rotates *blocks* of coefficients and *does so within each array*. Thus, the respective limitations at issue each distinguish over the block rotator of Zeng in two respects. First, the block rotator of Zeng fails to change the position of a coefficient relative to another (i.e. transposition of one coefficient with another); the rotation of a block does not switch the position of *any* coefficient with respect to another coefficient. Second, the block rotator simply rotates blocks, each within its own array, hence does nothing between different arrays.

In view of the foregoing amendments and remarks, the applicant respectfully requests reconsideration and allowance of claims 1-22 and 24.

Respectfully submitted,

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